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Arthur A. Povelones, Jr.

May 8, 2025

VIA ECF

Hon. Gabriel W. Gorenstein, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: AA, et al. v. City of New York, et al.

Docket No. : 25-cv-752 (DEH) (GWG)
Our File No. : 7004.51077

Dear Judge Gorenstein:

This firm represents defendants Mosholu Montefiore Community Center and Child Development Center of Mosholu Montefiore Community Center in this case. We are requesting a conference to discuss the current discovery deadlines.

This firm requested a thirty-day extension of the deadline to respond to opposing counsel's interrogatories and demand for documents (from May 14, 2025 to June 13, 2025), in light of our client's ongoing efforts to gather the necessary information. David Blaxill of this firm conferred by telephone with counsel for the other parties on May 7 for approximately ten minutes regarding the request. Counsel for the City Defendants consented, but Plaintiff's counsel objected to an extension of that length, and would only consent to an extension of 2-3 days. This is insufficient, and Mr. Blaxill informed counsel that a request would be made at the conclusion of the telephonic conference.

Also, as this letter was being finalized, counsel for City Defendants sent an e-mail requesting on their own behalf an extension of the response deadline until May 19, in order for them to arrange for appropriate production of electronic documents. We do not object to this request.

Therefore, we believe that a conference would be beneficial for the parties. Also, of course, a conference is required prior to filing a motion requesting an extension of a discovery deadline pursuant to section 2(A) of Your Honor's Individual Practices.

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If amenable to the court, please advise some dates and times that the Court can conduct a conference and the parties will select a date/time that works. Please note that the handling attorney for this firm, Eric Koplowitz, is away until May 13, 2025, and counsel for the City Defendants would prefer to avoid May 15th and May 21st.

Your Honor's attention to this matter is greatly appreciated.

Respectfully,

Arthur A. Povelones, Jr.

Arthur A. Povelones, Jr.

cc: Counsel of Record (via ECF)
Eric Koplowitz, Esq. (via ECF)